

Ren Rong Pan Attorney At Law

E-mail: rpanlaw@yahoo.com



Via ECF/E- Mail

NEW JERSEY OFFICE:
75 Main Street, Suite 201
Millburn, NJ 07041
Tel: (917) 536-8342
Fax: (973) 379-3197

April 24, 2025

Hon. Jessica S. Allen
District Court of New Jersey
Newark, NJ

Re: **Joint Status Report Letter**

JINHUA HIBO TECHNOLOGY CO.,LTD., v. USMARTPLUS INC.

Case Number: 2:24-cv-08257-CCC-JSA

Dear Hon. Allen:

I represent Defendant in the captioned civil action. Per Your Honor's Order dated April 1, 2025, I wish to respond to Plaintiff counsel's letter dated April 23, 2024, upon information and belief, as follows:

1. Defendant did serve the Deposition Notices upon the Plaintiff Counsel on 04/16/2024 with a request for a proposed Joint Discovery Plan – once “she has done her part.”
2. I did not receive any response until today – April 24, 2024 – apparently Plaintiff’s “new counsel” named Adam Wiener emailed the response with Plaintiff’s Deposition Notice. That’s the reason why I never received any previous emails or telephone calls from the Plaintiff’s Counsel. The same counsel filed “Plaintiff’s Status Report” just a few hours later on the same day. I did submit the Joint Status Report earlier today.
3. The Parties did exchange their responses to Requests for Production of Documents except that, to date, I have yet to receive copies of the documents or provided with reasonable access to such documents allegedly containing 375 pages. Once I receive the said documents, I will gladly withdraw my characterization of “bare bones.”
4. Furthermore, Parties did engage in settlement negotiations **albeit Plaintiffs never compromise from the position of getting full claim of \$800,000.00 while Defendant has offered \$100,000.00 – continuing from where they last left off back in February last year. As we view it, the ball is in the plaintiffs’ court.**

Thank you for your Honor’s anticipated courtesies in this matter.

Sincerely yours,

S/ Ren Rong Pan

Ren Rong Pan, Attorney at Law

RRP:ck

c. c. Adam Wiener and Jessica Chen
Counsel for Plaintiff (Via CMECF)